

United States District Court

United States District Court
Southern District of Texas
FILED

SOUTHERN

DISTRICT OF

TEXAS

AUG 09 2007

UNITED STATES OF AMERICA

V.

Heliodoro MORENO (41 YOA)

Michael N. Milby
Clerk of Court

CRIMINAL COMPLAINT

CASE NUMBER:

B-07-797 MJ

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or August 7, 2007 in Willacy County, in the Southern District of Texas defendant(s) did, (Track Statutory Language of Offense)

knowingly and intentionally Possess with intent to distribute approximately 13.16 kilograms of cocaine, a Scheduled II Controlled Substance, under the Controlled Substance Act of 1970, in violation of Title 21 USC 841 (a)(1), and did further Conspire with Intent to Distribute that same 13.16 kilograms of cocaine, in violation of Title 21 USC 846.

in violation of Title 21 United States Code, 846 and 841(a)(1)

I further state that I am a(n) Special Agent and that this complaint is based on the following Official Title

facts: On August 7, 2007, Texas Department of Public Safety Trooper Lionel Trevino conducted a traffic stop for defective equipment on a 2003 Jeep Liberty, TX #122XDX traveling northbound on HWY I-77 in Raymondville, Texas. Trooper Trevino obtained consent to search from the driver identified as Heliodoro MORENO. Trooper Trevino observed a false modified compartment that contained approximately 12 kilograms of cocaine. MORENO admitted to placing the cocaine in the false compartment. MORENO was arrested without incident.

Continued on the attached sheet and made a part

☐ Yes ☒ No

SA David Nichoff
Signature of Complainant

Sworn to before me, and subscribed in my presence,

August 9, 2007
Date

at Brownsville, Texas
City and State

U.S. Magistrate Judge John William Black
Name and Title of Judicial Officer

[Signature]
Signature of Judicial